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November 30, 2005

Via ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue, N.E.
Suite 110
Washington, D.C. 20002

Re: Facility ID No. 147
WTIC-TV Hartford, Connecticut
WTIC's Section 339(a)(2)(D)(vii) Waiver Request
MB Docket No. 05-317

Dear Ms. Dortch:

Tribune Television Company ("TTC"), licensee of WTIC-TV, NTSC Channel 61/DTV Channel 31, Hartford, Connecticut, by its undersigned counsel, hereby requests a waiver of the April 30, 2006, DTV signal strength testing deadline authorized by the Satellite Home Viewer Extension and Reauthorization Act of 2004 ("SHVERA"). This waiver request is filed pursuant to the Commission's recent Public Notice announcing the deadline for filing SHVERA signal strength waivers for network affiliates in the top-100 markets.¹ TTC requests an extension because it has been unable to complete construction of WTIC-DT's maximized facility due to a delay in securing Canadian consent/coordination.²

WTIC is the Fox affiliate in the Hartford-New Haven, Connecticut DMA, which is one of the top-100 markets in the U.S. WTIC has a pending minor modification application proposing to maximize WTIC's DTV facilities and conform them to the latest technical specifications of WTIC's tower which is to be modified and strengthened by its owner. See FCC

¹ Public Notice, "DTV Station Requests for Waiver of Digital Testing Pursuant to the Satellite Home Viewer Extension and Reauthorization Act of 2004 to be filed by November 30, 2005 on February 15, 2007," DA 05-2979, released November 17, 2005.

² See 47 U.S.C. § 339(a)(2)(D)(viii)(I).

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File No. BMPCDT-20040616AAM. The tower improvement work includes the addition of a new candelabra to be installed on the top of the tower where, *inter alia*, WTIC's high-powered DTV antenna will be installed.

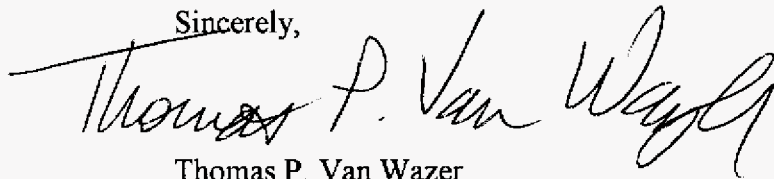
Pending the grant of the WTIC's DTV maximization application and the completion of the tower work, the station has been operating pursuant to Special Temporary Authority ("STA"). See FCC File No. BMDSTA-20040225ABV. This modified WTIC-DT STA operation provides substantial service to the Hartford market -- approximately 75 percent of the population inside the noise limited contour of WTIC-DT's channel 31 allotment receive service from the WTIC-DT STA facility. In addition, the modified WTIC-DT STA operation provides service to 100 percent of the land area in the Hartford DMA and the requisite 48 dBu signal to Hartford, WTIC's city of license.

Prior to the due date of FCC Form 381, TTC learned that the FCC had been unable to complete coordination with Canada on WTIC's pending maximization DTV construction permit application. Accordingly, TTC certified on Form 381 that it would build-out the facilities proposed in the construction permit application but that those facilities had not been authorized due to a pending international coordination issue. See FCC File No. BCERCT - 20041104AYB. On June 8, 2005, the Commission issued to WTIC a tentative channel 31 designation for its post-transition DTV operations.³

TTC has been prevented from completing construction of WTIC's maximization application for a number of reasons in the past few years, including a significant delay due to local zoning problems that ultimately forced WTIC's landlord to abandon plans to construct a new tower to accommodate the DTV facilities of WTIC and other local stations. Most recently, TTC has been unable to complete construction of WTIC's maximized DTV facilities because the FCC has not yet acted on its underlying construction permit application due to delays in securing Canadian concurrence. See FCC File No. BMPCDT-20040616AAM. For this reason, TTC submits it has satisfied one of the waiver criteria specified in SHVERA and therefore the FCC should grant the instant request for a waiver of the DTV signal strength measurement deadline.

Please direct any questions regarding this request to the undersigned.

Sincerely,



Thomas P. Van Wazer

³ Public Notice, "DTV Tentative Channel Designations for 1,554 Stations Participating in the First Round of DTV Channel Elections," DA 05-1743, released June 23, 2005 & Accompanying Table.